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May 1, 2024

VIA ECF

Honorable Katharine H. Parker
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 17D
New York, New York 10007

Re: Arlene Delgado v. Donald J. Trump for President, Inc., et al.
Civil Action No. 19-cv-11764 (AT) (KHP)

Dear Judge Parker:

We represent defendants Donald J. Trump for President, Inc., Sean Spicer, and Reince Priebus in the above-captioned action and are writing to briefly respond to plaintiff's May 1, 2024 letter asserting that defendants did not comply with this Court's April 24, 2024 order (the "April 24th Order"). ECF Doc. No. 265.

In the April 24th Order, the Court directed defendants to (i) contact defendants' predecessor counsel concerning a specific document sought by plaintiff, (ii) provide information concerning any gender-related complaints made against the Campaign during the 2016 and 2020 election cycles, and (iii) identify the Campaign's Human Resources Directors from 2015 through 2020.¹ In the April 24th Order, the Court did not include a deadline for item (i), but ordered defendants to provide the information for items (ii) and (iii) by May 7th.

Yesterday, we informed plaintiff that we had already contacted defendants' predecessor counsel, which confirmed that the specific document sought by plaintiff has already been produced to her. Further, during the parties' meet and confer earlier today, we advised plaintiff that defendants are working with their e-discovery vendor to address the information for items (ii) and

¹ The Campaign has already provided plaintiff with information regarding gender-related complaints made against the Campaign during the 2016 election cycle. The Campaign has also already identified its Human Resources Director in 2016 and early 2017.

(iii), and that defendants intend to provide this information to plaintiff by May 7th by way of a continued 30(b)(6) deposition, as the Court expressly permitted in the April 24th Order.

As such, plaintiff's May 1st letter regarding defendants' purported "refusal to comply with the April 24th Order" is unequivocally false. In fact, during today's meet and confer, *plaintiff admitted that she had not even read the entirety of the April 24th Order before she submitted her May 1st letter.*

Respectfully submitted,

Jared E. Blumetti

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